

Superfund Sediment Site Questions for Region 6

GAO 100205

1. Please provide a brief description of the region's sediment sites. At what stage are these sites in the remedial response process?

The Star Lake Canal Superfund site is located in Jefferson County, in and around the cities of Port Neches and Groves, Texas. The site has been divided into seven areas of investigation (AOI): Jefferson Canal, Jefferson Canal Spoil Pile, Former Star Lake, Star Lake Canal, Gulf States Utility Canal, Molasses Bayou Waterway and the Molasses Bayou Wetland. Industrial operations have occurred in the area surrounding the site since the early 1940s. Jefferson and Star Lake Canals have received industrial wastewater and stormwater discharges from local chemical and other manufacturing facilities for a number of years. Star Lake and Jefferson Canals have been used by the surrounding industry for permitted discharge of industrial effluents. The discharges have occasionally exceeded allowable limits for some constituents and this has resulted in the deposition of potentially hazardous constituents at the site. In 1983, the Jefferson County Drainage District Number 7 (DD #7) dredged the Jefferson Canal after acquiring an easement on the canal from Texaco Chemical Company. The DD #7 deposited dredged materials onto the banks of Jefferson Canal in and around an area south of FM Road 366. The deposited dredged material was subsequently determined to contain potentially hazardous constituents. The area where the dredged material was deposited is identified as the Jefferson Canal Spoil Pile AOI. The contamination at the Star Lake Canal site is considered to be low level threat waste and is not considered to be a principal threat waste. EPA is close to completing negotiations with the PRPs to conduct the remedial design for the site.

2. What is the region's role in managing the Superfund remedial response process for sites with contaminated sediment?

For the PRP lead Star Lake Canal site, the Region is conducting oversight activities.

3. How does the region coordinate with EPA HQ during the remedial response process for sites with contaminated sediment?

Region 6 consulted with EPA HQs prior to issuing the Proposed Plan for the site.

- a. How does this coordination help or hinder decision making during the remedial response process, especially during remedy selection for a specific site?

The coordination is helpful in ensuring that the remedy selected in consisted with sediment remedies at other Superfund sites.

4. How does the region coordinate and work with the cleanup-lead (e.g., a State agency, Federal agency, or Potentially Responsible Parties (PRPs)) during the remedial response process?

The Region worked closely with the PRPs during the Remedial Investigation and Feasibility Study to ensure that the EPA Superfund guidance were followed. The Region coordinated with the Texas Commission on Environmental Quality (TCEQ) and Natural Resource Trustees (Federal and State) to review and comment on documents submitted by the PRPs. The Region is currently negotiating the Remedial Design for the Site and reviewing and commenting on the design workplans.

5. What are the key EPA policies or guidance relied upon by the region when managing contaminated sediment risks at Superfund sites?
- **Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites**
 - **USEPA Contaminated Sediment Remediation Guidance for Hazardous Waste Sites, EPA/540/R-05/012, December 2005**
- a. What is your opinion of these policies and guidance?
- Policy and guidance is useful when conducting work at a sediment site. The documents provide important concepts to follow and use in evaluating and cleaning up a site.**
- b. What challenges, if any, has the region experienced in implementing these policies and guidance on Superfund sediment sites? How could these challenges be addressed?
- As stated above, the policies and guidance are helpful, but each Superfund sediment site is unique and cannot guide the RPM in determining each specific study or action to take.**

6. What steps does the region take to ensure that these policies and guidance are being considered and implemented in the remedial response process for Superfund sites with contaminated sediment?

The policies and guidance were followed for the RI/FS and ROD. These policies and guidance include the RI/FS Guidance, Risk Assessment Guidance for Superfund, Ecological Risk Assessment Guidance for Superfund, Data Quality Objective (DQO) guidance and the Integrated Risk Information System (IRIS).

7. Please describe the process used by the region for considering and responding to comments provided by EPA's Office of Superfund Remediation and Technology Innovation (OSRTI) for Tier 1 sites (those sites with more than 10,000 cubic yards of contaminated sediment or 5 acres).

The Region provided a consideration memo to EPA HQs and the draft Proposed Plan for review and comments. The Region discussed the comments with HQs and implemented the comments as applicable to the site.

- a. What is the region's opinion on OSRTI's review of the Consideration Memo (including the type of comments they give)?
 - b. What challenges, if any, has the region experienced in the Tier 1 review process?
 - c. How, if at all, could the Tier 1 review process be improved?
8. What challenges, if any, does the region face in managing cleanups of Superfund sediment sites from both a regional and agency-wide perspective? What opportunities, if any, exist to address these challenges?

The remedial action for Star Lake Superfund site has not been implemented at this time. The Region is currently negotiating the Remedial Design with the PRPs. The challenge for cleaning up this site will be accessibility for construction equipment to excavated contaminated materials and to place a cover for those area that do not require excavation.

9. Please provide a few examples of Superfund sediment sites that present challenges for the region. What attributes have made these sites challenging?

The San Jacinto Superfund site presents a cleanup challenge due to its location on the San Jacinto River. A remedy has not been selected, but there are challenges to all the alternatives being considered.

10. Please provide a few examples of Superfund sediment sites in the region that are "success stories". What attributes have made these sites successful?

What is the definition of a "success story"